

REMARKS/ARGUMENTS

Preliminarily, Applicants thank the Examiner for indicating the allowability of claims 21-25 and 54-58. Reconsideration and allowance of the present application based on the following remarks are respectfully requested. Claim 14 has been cancelled. Claims 21-22, 25, 54 and 58 have been amended by rewriting them in independent form. Support for this amendment may be found in the claims as originally filed for this reissue application. Claims 66 and 67 have been added. Support for the new claims may be found throughout the specification, for example at column 8, lines 26-29 and at column 9 line 62 to column 16, line 37. No new matter has been added. Upon entry of the above amendments, claims 1-13 and 15-67, as amended, will be pending.

Claims 1, 3-8, 10-11, 13, 27, 30, 33, 36, 39, 42, 45 and 48 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over WO 96/35756 to Chikaoka *et al.* ("Chikaoka"). Claims 1-13, 15-20, 26-53, and 59-65 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Chikaoka in view of U.S. Patent No. 5,674,922 to Igarashi *et al.* ("Igarashi") as evidenced by U.S. Patent No. 5,434,196 to Ohkawa *et al.* ("Ohkawa").

With respect to the rejection in view of Chikaoka, the Examiner acknowledges that Chikaoka does not teach adding oxetane compounds to the composition (See Office Action at page first full paragraph). However, the Examiner contends that Chikaoka teaches that the "remaining 50% of the cationically curable organic compound can be chosen from epoxy compounds having one epoxy group per molecule or can be chosen from other cationically polymerizable compounds, such as oxetane compounds." Applicants respectfully traverse this rejection. Chikaoka specifically requires the presence of a thermoplastic polymer compound as an "essential component" of the invention (See US equivalent of Chikaoka at column 2, lines 33-41). As such, the composition of Chikaoka would have significantly different properties when cured. For example, the Examiner has failed to establish that such compositions, when utilized in a photo-fabrication process, would exhibit the dimensional accuracy (claims 1, 3-7, 10) or would constitute selectively curing a photo-curable resin (claims 8, 10-11, 13, 27, 30, 33, 36, 39, 42, 45) as claimed by applicants. Applicants respectfully submit that such compositions would not exhibit these claimed properties and that a rejection based on Chikaoka is therefore improper. For at least these reasons, Applicants respectfully request reconsideration and withdrawal of this rejection.

With respect to the §103(a) rejection in view of Chikaoka in view of Igarashi as evidenced by Ohkawa, Applicants respectfully traverse this rejection. Initially, applicants respectfully disagree with the Examiner's contention that Igarashi is analogous art to the present invention. Igarashi characterizes its field of invention as providing "cured products with excellent adhesion to basic materials." (col. 1, lines 10-11.) Elsewhere, Igarashi notes that the materials to be coated include lumber, metal, plastic, paper, and other materials. (Col. 1, lines 13-15; col. 2, lines 1-3; col. 7, lines 47-53; col. 8, line 64 through col. 9, line 4.) Nothing in Igarashi discloses or suggests that these materials would be suitable, or even useful, as compositions for use in the field of photo-fabrication processes for forming three-dimensional objects. It is respectfully submitted that the skilled person working in the field of photo-fabrication processes would not consult the art of paints, inks, and adhesives when seeking suitable resins. This is further evident in that Igarashi discloses that coating such materials ordinarily requires substantially low energy (see col. 1, lines 13-17). This is not the case with photo-fabrication processes, which typically utilize high energy lasers to effect cure.

Even if it is assumed that Igarashi is analogous art, which applicants dispute for the reasons noted above, applicants respectfully submit that the Examiner has failed to establish a prima facie case of unpatentability. In this regard, Igarashi only discloses the optional use of one or more inactive components such as "inorganic fillers, dyes, pigments, viscosity adjusters, various treating agents and/or UV-shielders." (Col. 6, lines 60-63.) Thus, Igarashi teaches away from use of its compositions in combination with Chikaoka's resins, which contain a thermoplastic polymer (including polymers with reactive functionality) as an essential component. To put it another way, the person of ordinary skill in the art would not be motivated to add Chikaoka's resins, which contain thermoplastic polymer, to the Igarashi compositions, which use optional inactive additives. Thus, it is improper to combine Chikaoka with Igarashi in the manner proposed.

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

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